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December 26, 2024

VIA ECF

Hon. Jennifer H. Rearden, U.S.D.J.
United States District Court
Southern District of New York
500 Pearl Street, Room 1010
New York, NY 10007

Application GRANTED IN PART. The Initial Pretrial Conference scheduled for January 13, 2025 and the associated deadlines in the Court's October 18, 2024 Order, *see* ECF No. 7, are adjourned *sine die*. The deadline to complete mediation is adjourned *sine die*. Plaintiff Bill Cannon shall move for default judgment no later than **January 11, 2025**.

The Clerk of Court is directed to terminate ECF No. 12.

SO ORDERED.

A handwritten signature in black ink that reads "Jennifer H. Rearden".

Jennifer H. Rearden, U.S.D.J.

Dated: December 28, 2024

Re: *Bill Cannon v. Historical Design, Inc.*,
Case No. 1:24-cv-07662-JHR

Dear Judge Rearden:

We represent plaintiff Bill Cannon ("*Plaintiff*") in the above captioned action. Pursuant to Paragraphs 2(A) and 2(E) of Your Honor's Individual Practices, Plaintiff respectfully requests an adjournment *sine die* of the deadline to complete mediation and an adjournment *sine die* of the January 13, 2025, Initial Pretrial Conference and the attendant deadlines in the Court's October 18, 2024, Order.

In support of this Motion, Plaintiff includes the following:

- (1) The Court has scheduled an Initial Pretrial Conference for January 13, 2025, at 1:00 p.m. (*Dkt. No. 7*);
- (2) Additionally, the Court has directed the parties to submit a joint letter and proposed Civil Case Management Plan and Scheduling Order no later than one week prior to the Initial Pretrial Conference (i.e., January 6, 2024) (*Dkt. No. 7*);
- (3) The Court has also referred this matter to the Court's Mediation Program and directed the parties to complete mediation at least two weeks prior to the Initial Pretrial Conference (i.e., December 30, 2024) (*Dkt. No. 8*);
- (4) This is the first request for an adjournment and/or extension of time;
- (5) Good cause exists for the instant request as Defendant has yet to enter an appearance in this action or respond to Plaintiff's Complaint and there is no party with which Plaintiff can confer regarding the preparation of the requisite joint letter and case management plan nor engage with in regard to mediation;



(6) In light of Defendant's inaction, Plaintiff intends to move for default judgment within thirty (30) days of the date of this submission.

The instant request is made in good faith and granting the requested adjournment will not prejudice any party to this matter. Thank you for your consideration of this request.

Respectfully submitted,

/s/ Joshua D. Vera
Joshua D. Vera
Counsel for Plaintiff